

We Prioritize the Safety and Health of our Employees

At Revlon, we are committed to eliminating hazards from the workplace, providing Revlon People with a safe and healthy work environment, and complying with all applicable occupational safety and health laws. Revlon People should report any adverse health or safety incidents or conditions, including broken equipment or machinery and accidents, to the person responsible for safety at each facility or to Revlon Compliance.

Revlon does not tolerate violence, or threats of violence, in the workplace. Firearms and other weapons are not permitted on Company property, even if you have a license or permit to carry a weapon, unless Revlon's Chief Compliance Officer and Head of Global Security have provided advance, express written permission.

Any violation of this provision should be reported immediately to Revlon Compliance and the Head of Global Security. In the event of an emergency, you should dial 911 or the applicable emergency services number. To promote productivity, protect the safety of others, and comply with the law, Revlon prohibits the use of illegal drugs or narcotics in our workplace. In addition, you may not perform your job if you are impaired by and/or under the influence of any illegal drugs, alcohol, marijuana, other controlled substances, or misused prescription drugs.

We Are Committed to Universal Human Rights and Fair Labor

Revlon is committed to respecting and promoting human rights, including providing fair and equitable wages to employees globally and recognizing employees' rights to freedom of association and collective bargaining. Revlon prohibits the use of child labor, forced labor, modern slavery, human trafficking and all other forms of human exploitation and unacceptable treatment of workers. Revlon expects that all Revlon People, as well as Revlon's suppliers and contractors, uphold the same standards. Revlon conducts business with organizations that respect human rights and are fair to their employees, as detailed in Revlon's **Third Party Code of Conduct**.



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We Comply with Environmental Laws and Regulations

Revlon is committed to evaluating all potential environmental impacts in corporate decision-making with a view to enhance conservation of energy and natural resources, avoid the release of any pollutant that may cause environmental damage, minimize the creation of waste, dispose of waste through safe and responsible methods, minimize environmental risks by employing safe technologies and operating procedures, and increase preparedness for emergencies, in compliance with all applicable environment laws.

Revlon People are prohibited from engaging in the following behavior:

- Bypassing any environmental control or monitoring device(s)
- Entering false information on any governmental environmental form, on any monitoring report or in response to any request for environmental information from any governmental agency
- Tampering with or diluting samples, or otherwise providing false information about the results of sampling, testing or analysis
- Intentionally failing to follow permit conditions or applicable protocols for collecting, sampling, testing, analyzing, or recording of environmental data

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**WE CONDUCT
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We Have Zero Tolerance for Bribery, Corruption and Money Laundering

As a global company, Revlon must comply with international anti-corruption and anti-bribery laws. Revlon People are prohibited from offering, promising, giving and/or receiving anything of value directly or indirectly to or from a third party, including government officials, to obtain an improper business advantage.

“Anything of value” includes:

- Cash, cash equivalents, including gift cards
- Lavish gifts, travel, entertainment, meals
- Even lower value gifts, not reasonably related to a legitimate business purpose
- Employment opportunities
- Charitable and/or political contributions
- Overpayments and/or discounts, including sham contracts
- Use of personal or company property, such as vacation homes

An **“improper business advantage”** can include inappropriately attempting to influence a business decision in favor of Revlon, to obtain or retain business, obtain a business permit or license, or influence the outcome of a government audit/inspection/decision.

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Improper Offers and Payments are Prohibited. It is not necessary that a gift or payment actually be given; the promise or offer alone is prohibited. This applies regardless of the country in which the payment is offered or made, and regardless of whether the recipient is a government official or private citizen. This prohibition also includes payments to expedite or facilitate routine government actions, such as expediting an import through customs, commonly referred to as facilitation payments.



Gifts to Government Officials Require Pre-Approval. No items of value should be offered or provided to a government official without written pre-approval from Revlon Compliance. The definition of a “government official” is broad and can include individuals who are employed by any public entity or institution or who perform any official acts on behalf of a government, regardless of status or seniority.

Closely Manage Third Parties. The prohibition on improper gifts and payments applies equally to actions taken by a third party working on our behalf. Before engaging a third party who will interact with government officials on our behalf, please work with Revlon Legal to ensure that contracts are in place and that due diligence has been completed, as appropriate.

Money Laundering is Prohibited. In addition to bribery, facilitating or engaging in money laundering and/or terrorist financing violates this Code and international laws. Money laundering is an attempt by individuals or entities to make the proceeds of illegal earnings appear legitimate or “clean.”

Revlon People should notify Revlon Compliance or Revlon Legal of any suspicious transactions or “red flags,” such as:

- Third party payments structured in an unusual way or coming from or directed to a strange account
- Overpayments
- Large payments in cash
- Payments made in unexpected currencies

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We Do Not Give or Accept Inappropriate Gifts or Entertainment

Employees are prohibited from giving or receiving excessive or uncustomary gifts or services to or from third parties. Gifts require pre-approval. As described above, any gifts to government officials or government employees require written pre-approval from Revlon Compliance regardless of the value.

Gifts valued below \$100 USD require written pre-approval from your General Manager.

Gifts valued above \$100 USD require written pre-approval from Revlon Compliance.

Pre-approval is based on:

- The dollar threshold, which is the actual cost or fair market value of the item. For example, if a third party offers you a free ticket to accompany them to a sporting event and tickets to the event originally sold for \$150 USD, the employee must obtain written pre-approval from Revlon Compliance, even if the third party states that there is no cost to the third party or the employee.
- Other factors, including the business reason for attending the event, any pending or recently signed deals with the third party, and the frequency with which you have attended other events with the same third party within the preceding twelve (12) months.

No Cash or Cash Equivalent Gifts are Permitted

Under no circumstances should Revlon People give or receive cash or cash equivalent gifts, including gift cards, to or from third parties, including vendors, suppliers, customers, distributors or anyone selling products on Revlon's behalf. Internal Company raffles or contests, where a gift card or other items of value may be awarded by Revlon as a prize to Revlon employees, must comply with applicable Human Resources policies and local marketing and tax laws.



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Here are **Do's and Don'ts** to help you understand the guidance about gifts to and from **third parties** at-a-glance:

Gifting Do's

Consider the following before giving/receiving a gift:

- Is there a legitimate business reason to give or receive a business gift?
- Are you currently negotiating a deal with the third party?
- Is it lavish?
- Is it appropriate under the circumstances?
- When was the last time you gave a gift to or received a gift from this third party?

Get pre-authorization in writing from the General Manager of your business before providing a gift to or receiving a gift from a customer, vendor or other business contact with a value of **less than \$100 USD**.

Get pre-authorization in writing from Revlon Compliance before providing a gift to or receiving a gift from a customer, vendor, or other business contact with a value of **more than \$100 USD**.

Get pre-authorization in writing from Revlon Compliance before providing a gift to a **government employee or official**, including employees of government-owned entities or businesses, **regardless of the value**.

Document your gifts to/from third parties, including the purpose, type, recipient information, dollar value, date, and approval documentation.

Gifting Dont's

Give/receive gifts that could create the risk of bribery or an actual/potential conflict of interest.

Examples include giving/receiving:

- Anything of value when negotiating a business deal or as a "thank you" for signing the deal.
- Excessive or uncustomary gifts or any other benefit (e.g., sporting event tickets, use of vacation property).

Accept a gift from or give a gift to a potential/existing vendor/third party with a value of over \$100 USD or accept/give multiple gifts from/to the same individual or entity with a total annual value exceeding \$100 USD, unless you receive written pre-approval from Revlon Compliance.

Give or accept cash or cash equivalent gifts, including **gift cards**.

Offer or accept any benefits (e.g., employment, discounts, overpayments, travel, meals, entertainment, etc.) to obtain an improper business advantage (whether directly or through a third party).

Make/accept charitable or political contributions to improperly influence a business decision in favor of Revlon.

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We Make *Bona Fide* Donations and Contributions, and Comply with Lobbying Laws

Monetary or in-kind charitable contributions, political contributions and lobbying are legitimate business activities that can also create compliance risk. To manage these risks, please follow the guidance below.

Charitable Donations. Like many companies, Revlon makes monetary or in-kind charitable donations, as a good corporate citizen. Revlon does not make charitable contributions in exchange for products, services, favors, or to generate or retain business.

To protect Revlon, Revlon People must complete a pre-approval process for corporate charitable donations, which includes completion of a background check on the recipient organization as well as pre-approval from Revlon Compliance and the CEO's Chief of Staff. Cause marketing or co-venture agreements where a charitable organization will receive a corporate donation from Revlon tied to product sales or consumer action must be vetted by Revlon Legal to comply with applicable marketing laws and by Revlon Compliance to perform background checks on the recipient organization.

As a general rule, Revlon does not make charitable contributions to the following:

- Individuals (including funding campaigns such as GoFundMe, etc.)
- Religious organizations
- Political causes, organizations, campaigns, or events
- Labor organizations
- Non-charitable organizations
- Organizations or programs that:
 - Discriminate based on age, gender, race, national origin, religion, sexual orientation, gender identity, veteran status, marital status, disability, or any other protected category under federal, state, or local law
 - Fund terrorist groups or activities
 - Otherwise pose an actual or potential conflict (e.g., employee personal charities) with and/or present reputational risk to Revlon

Revlon cannot support personal charitable activities and employees cannot use their position with our Company to solicit charitable donations or create an appearance that Revlon endorses or supports personal charitable activities.

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Political Contributions. Revlon prohibits the use of Company funds, assets, services or facilities for a political party or candidate, except under certain limited circumstances. Employees may voluntarily make personal political contributions, participate in the political process on their own time and at their own expense, express their personal views on legislative or political matters, or engage in any other lawful political activities, if those activities are not performed on behalf of or attributable to Revlon.

Revlon People are also prohibited from compensating or reimbursing any employee or third party for any political contribution. Revlon People may not solicit other employees or third parties who provide services for Revlon to make contributions to a political party, candidate, or political action committee without pre-approval from Revlon Compliance or Revlon Legal. If approved, such solicitation must communicate that all contributions are voluntary, that no one will be adversely affected as a result of their decision not to contribute, and that political contributions are not tax deductible.

Lobbying. Revlon sometimes engages in direct advocacy with lawmakers and other government officials, and sometimes engages third parties to advocate on our behalf. Revlon People are prohibited from contacting government officials or engaging others to do so on Revlon's behalf unless expressly authorized by Revlon Compliance or Revlon Legal.



We Do Not Engage in Anti-Competitive Behavior

Revlon takes pride in competing fairly and legitimately in the markets in which we operate. As such, all Revlon People must comply with competition laws and regulations (known as “antitrust” laws in the U.S. and similar laws in other countries), which are designed to promote free and open competition, as described further below. Business practices that may implicate competition laws include:

Pricing Considerations. We should always make independent pricing decisions for each of our products based on factors such as value to the customer, cost, and competitive pressure in the marketplace. We must not exchange confidential information, such as product prices, fees charged, promotional allowances, promotional plans, other marketing fund allowances, profit margins or credit and billing practices, with competitors.

In addition, in the U.S., all promotional allowances and services, free goods, display fixtures, volume discounts, advertising, merchandising assistance and demonstrators must be offered on functionally equivalent, proportionately equal terms, to all customers who compete in selling the Company's product in the same channels and markets.

Resale Price Maintenance. We can recommend resale prices to customers, but cannot set or enforce minimum resale prices, or otherwise interfere with a customer's right to establish its own resale prices.

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Tying. Tying may occur when a buyer is required, as a condition of purchasing one product, to also purchase a second, distinct product. Tying arrangements should never be implemented without first consulting Revlon Legal.

Confidential Information. We may not exchange any confidential information with a competitor. Confidential information includes any information that is non-public, including but not limited to planned product launches, new product development, costs, and pricing.

Industry Events. Any agreement, whether formal or informal, or any joint activity involving the Company and any competitor, where the intent or effect is to reduce competition, is against antitrust and competition laws and regulations. If you attend trade association meetings and other industry gatherings, you should avoid discussing price, discounts or promotions, or any other information that could result in restricting competition in the marketplace. If any of these topics are raised during the association/industry meeting, do not participate in the discussion, tell the participants that you are leaving the meeting because such topics were raised and immediately contact Revlon Legal or Revlon Compliance.

We Comply with U.S. and Other Applicable Trade Regulations and Sanctions Regimes

As a multinational company, Revlon and all Revlon People must comply with U.S. trade regulations, regardless of the country in which you are operating. U.S. trade regulations also require that Revlon and our third party partners comply with specific sanctions, available online at: <http://www.treasury.gov/resource-center/sanctions/Programs/Pages/Programs.aspx>. If you are operating in a country outside of the U.S., you must also comply with the trade regulations and sanctions regimes in the U.S. and the local laws in that country.



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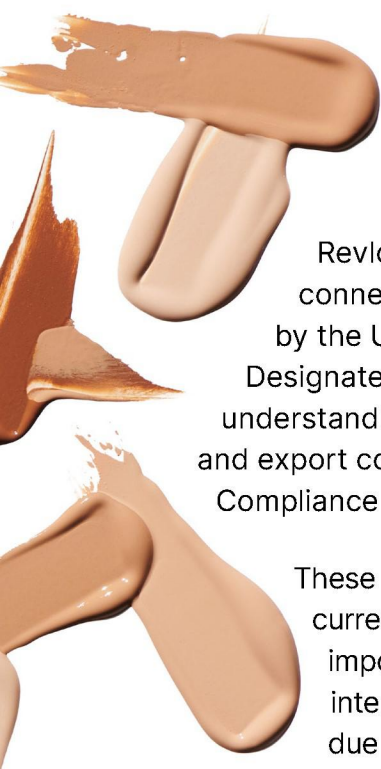
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U.S. sanctions prohibit U.S. companies from conducting any business activity such as the manufacture, distribution, or sale of products in certain countries/territories, including but not limited to, directly or indirectly, with or to North Korea, Syria, Cuba, Iran, and Russian occupied territories in Ukraine (e.g., the Crimea Region, Donetsk and Luhansk). Other areas of significant sanctions risk and export controls may include but are not limited to Afghanistan, Belarus, China, Myanmar, Russia, Venezuela, West Bank and Gaza, and Yemen.



As a result, advance written authorization from Revlon Compliance is required to confirm that any business activity on behalf of Revlon in areas of sanctions risk and/or export controls (including but not limited to the illustrative list above) would comply with U.S. trade laws before engaging in any such activity on Revlon's behalf.

Revlon People are also prohibited from conducting any business on Revlon's behalf or in connection with Revlon's business with any person or entity that is subject to sanctions by the U.S. Government or other local governments where we operate, including "Specially Designated Nationals" and other "Denied Persons." In order to satisfy this obligation and with the understanding that U.S. embargoed countries and territories and areas of significant sanctions risk and export controls may change from time to time, you are responsible for following Revlon Legal/ Compliance and Procurement processes to help the Company manage this risk.

These prohibitions and restrictions are subject to change and may affect exports, imports, travel, currency transactions, and assets and accounts. The civil and criminal penalties that may be imposed for violations are severe. Accordingly, Revlon People who have responsibility for international business activities must follow Company risk management procedures, including due diligence processes to appropriately screen third parties against government sanctions lists and should consult frequently with Revlon Compliance or Revlon Legal with any questions.

For more information about government sanctions and related laws, such as anti-boycott laws, please visit the Compliance page on oneinbeauty.com. If you have questions about whether certain activities are prohibited, please contact Revlon Compliance, and do not engage in such activity until you have received approval from Revlon Compliance.

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We Work with Reputable Business Partners

Revlon works with reputable third-party partners who meet our high standards of business ethics and embrace our professional values, which are codified in Revlon's **Third Party Code of Conduct** ("Third Party Code").

Revlon People must follow Company risk management procedures, including due diligence processes, such as background checks on third parties, and follow internal approval procedures before signing an agreement with a third party to perform services for Revlon.

The Third Party Code requires that all Revlon third party partners comply with all applicable laws including anti-bribery and anti-corruption, anti-money laundering, anti-terrorism, antitrust and competition, data privacy and protection, cybersecurity, environmental and health and safety, labor and employment, product manufacturing, product quality and safety, international trade regulations, sanctions, import/export and product registration. The Third Party Code also prohibits third party partners from using forced labor and child labor, engaging in modern slavery, human trafficking and exploitation or any other unacceptable treatment of workers.

It is your responsibility when engaging with a third-party supplier, vendor, or business partner to confirm that the third party understands and agrees to comply with Revlon's Third Party Code. A third party should not be permitted to perform services for Revlon until the steps described above have been completed.

Revlon People and all third party partners are required to report actual or suspected violations of Revlon's Third Party Code or applicable law to Revlon Compliance.

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